

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

SAVI TECHNOLOGY, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action No. 1:19-cv-01482-RDA-IDD
DKP MFG, INC. f/k/a DAE KYUNG PHILIPPINES COMPANY INCORPORATED,)	
)	
)	
Defendant.)	

REPORT OF PARTIES' PLANNING MEETING

1. The following persons participated in a Rule 26(f) conference on June 1, 2020:

Daniel F. Markham, counsel for Savi Technology, Inc. "(Savi")
Jodie Gerard, counsel for Savi
Joseph M. Katz, counsel for Savi
Kathryn Bonorchis, counsel for Defendant DKP Mfg., Inc. ("DKP")
Paul C. Kuhnel, counsel for DKP

2. Initial Disclosures. The parties will exchange the initial disclosures required by Rule 26(a)(1) by June 15, 2020. The parties will identify documents by category and will not attach those documents to their initial disclosures.

3. Discovery Plan. The parties propose the following discovery plan:
 - (a) The parties anticipate that discovery will be needed on the following subjects:

All claims and defenses.

 - (b) All discovery, including that of experts, will be commenced in time to be completed by November 13, 2020.

 - (c) Initial Requests for Documents will be served by June 30, 2020.

(d) The maximum number of Interrogatories by each party to any other party will be thirty. All Interrogatories must be served in time so that same may be answered within the time prescribed by said rules and by July 30, 2020.

(e) The maximum number of requests for admission by each party to any other party will be governed by Fed.R.Civ.P. 36. All Requests for Admission must be served in time so that same may be answered within the time prescribed by said rules and by October 30, 2020.

(f) The parties will be limited to five (5) non-party, non-expert depositions each. This limitation does not apply to party depositions, expert depositions or out-of-state *de bene esse* depositions for use at trial.

(g) In accordance with Fed.R.Civ.P. 30, each deposition will be limited to one (1) day of seven hours.

(h) Disclosure or discovery of electronically stored information (“ESI”): The parties proposed that all ESI in existence will be maintained and the production of same will be governed by the Federal Rules of Civil Procedure and applicable Local Rules, subject to claims of privilege, work-product, or other doctrine protecting the information from disclosure. ESI shall be produced in its native format.

4. Other Items.

(a) The initial pretrial conference is set for June 24, 2020 at 11:00 AM.

(b) The final pretrial conference is set for November 19, 2020 at 10:00 AM.

(c) Subject to Magistrate Judge Ivan D. Davis’s schedule, counsel for both parties are available the week of August 17, 2020 for a settlement conference.

DATED this the 15th day of June, 2020.

Respectfully submitted,

/s/ Joseph M. Katz

Jason W. McElroy (VSB No. 71250)

Joseph M. Katz (VSB No. 80541)

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